

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

MOLLI CHANG :
:
Plaintiff, :
:
vs. : Civil No. 8:22-cv-2208
:
CHRISTOPHER JACKSON, et al. :
:
:
Defendants, :

JOINT MOTION TO MODIFY SCHEDULING ORDER

COME NOW, Plaintiff Molli Chang (“Plaintiff”) and Defendant Washington Metropolitan Area Transit Authority (“WMATA”), by and through the undersigned counsel, and pursuant to the Federal Rules of Civil Procedure 6(b)(1)(A) and 16(b)(4), hereby move to continue dates in the Scheduling Order to allow the Parties to complete remaining discovery. In support thereof, the Parties state as follows:

1. This case arises out of personal injuries sustained by Plaintiff on June 27, 2019. Plaintiff alleges that she sustained a major hand injury while struck by Defendant WMATA’s Metro bus in Silver Spring, Maryland, due to an alleged failure to heed traffic before proceeding with a left turn by the Metro Bus driver.

The Parties have been working cooperatively and have been diligently engaged in discovery in this matter. The Parties agree additional time is needed to complete discovery in an efficient manner.

The Parties have scheduled the deposition of damages fact witness Soo Young Chang for March 6, 2025, the earliest date she was available.

The Parties are also in the process of scheduling additional fact witness depositions including including WMATA's corporate designee. This deposition will be completed before the proposed close of discovery.

2. The Parties are also working collaboratively to schedule the depositions of the Parties' designated experts. These depositions will also be completed before the proposed close of discovery.

3. Accordingly, the Parties agree that they cannot complete the remaining discovery, including the depositions of the identified fact and expert witnesses before the current discovery deadline.

4. No Party will be prejudiced by the granting of this Motion.

For the reasons set forth above, the Parties respectfully request that this Court enter an Order, amending the Scheduling Order deadlines as follows:

Event	Current Deadline	Proposed Deadline
Close of Discovery; Submission of Joint Status Report	January 27, 2025	May 27, 2025
Request for Admission	February 3, 2025	June 3, 2025
Dispositive Pretrial Motions Deadline	February 10, 2025	June 10, 2025

WHEREFORE, the Plaintiff Molli Chang and Defendant WMATA respectfully requests that this Honorable Court enter an Order continuing the dates in the Scheduling Order as requested.

Respectfully submitted,

JEZIC & MOYSE, LLC

/s/ Jonathan Carroll

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